

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

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v.

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ISIAH L YOUNGBLOOD,

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Defendant.

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Case No. 1:23-mj-182

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Officer Kyle Hudson, being duly sworn, state the following:

1. I entered on duty with the Security Protective Service (“SPS”) of the Central Intelligence Agency (“CIA”) in July 2022. Prior to joining SPS, I served as a Uniformed Division officer with the United States Secret Service for approximately two years.
2. This affidavit is submitted in support of a criminal complaint charging ISIAH L YOUNGBLOOD with criminal trespass at the George Bush Center for Intelligence in McLean, Virginia (“CIA Headquarters”), in violation of 32 C.F.R. § 1903.7(a), which prohibits entering or remaining onto any CIA installation without proper authorization, or reentering any CIA installation after being ordered to leave or after being instructed not to reenter.

3. The facts and information contained in this affidavit are based upon my personal knowledge and observations during the course of this investigation, information conveyed to me by other individuals, including law enforcement officers, and my review of records, documents, and other physical evidence obtained during the investigation. This affidavit contains

information necessary to support probable cause, and it is not intended to include each and every fact and matter observed by me or known to the government.

4. On Thursday, September 21, 2023, at approximately 10:00 p.m., I observed an individual walk down the outbound lane of the road connecting Route 123, which is located within the CIA Headquarters' property line in McLean, Virginia, within the Eastern District of Virginia. The individual was later identified by his Alabama driver's license as the defendant, ISIAH L YOUNGBLOOD. Upon approach to the main entrance of CIA Headquarters, the defendant walked past two warning signs which read in relevant part:

WARNING
RESTRICTED
U.S. GOVERNMENT
INSTALLATION
EMPLOYEES AND OFFICIAL
VISITORS ONLY
IT IS UNLAWFUL TO ENTER
OR ATTEMPT TO ENTER
THIS INSTALLATION WITHOUT
PROPER AUTHORIZATION

32 C.F.R. 1903

5. I was standing at the main entrance of CIA Headquarters when I saw the defendant walking down the outbound lane of the road connecting Route 123 to the CIA's main entrance. Using a marked police cruiser, I drove up to the defendant and recognized him as ISIAH L YOUNGBLOOD, who I had encountered earlier that same day. I am aware that the

defendant trespassed at CIA Headquarters on three prior occasions on the same day, September 21, 2023. On the first two occasions, I am aware that the defendant was issued a verbal warning and told not to return to the CIA. On the third occasion, I personally encountered the defendant at approximately 8:40 p.m., and the defendant stated that he wanted to talk to an individual at the CIA. The defendant was issued a mandatory appearance criminal citation (9041426) with an appearance date of September 28, 2023, and again told not to return to CIA.

6. When I exited my police cruiser and approached the defendant at approximately 10:00 p.m., he held his head down and complied with my instructions. I confirmed through CIA databases that the defendant did not have authorization to enter an Agency installation, and then I placed the defendant under arrest.

7. Based on the foregoing, I submit there is probable cause to believe that on or about September 21, 2023, within the Eastern District of Virginia, ISIAH L YOUNGBLOOD did enter or remain on a CIA installation without authorization, in violation of 32 C.F.R. § 1903.7(a).



Officer Kyle Hudson
Security Protective Service
Central Intelligence Agency

Subscribed and sworn to before me
This 22nd day of September 2023.

Digitally signed by John F.
Anderson
Date: 2023.09.22 12:32:10
-04'00'

The Honorable John F. Anderson
United States Magistrate Judge
Alexandria, Virginia